

UNITED STATES DISTRICT COURT

for the

District of South Carolina

In the Matter of the Seizure of
(Briefly describe the property to be seized)2050.51999214281 TETHER
CRYPTOCURRENCY (USDT) held within account
527231086

Case No.

6:25cr 516

APPLICATION FOR A WARRANT
TO SEIZE PROPERTY SUBJECT TO FORFEITURE

I, a federal law enforcement officer or attorney for the government, request a seizure warrant and state under penalty of perjury that I have reason to believe that the following property in the _____ District of

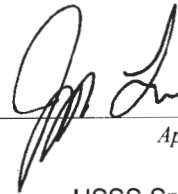
South Carolina is subject to forfeiture to the United States of America under _____ 18 U.S.C. §

981, 982 (describe the property):

2050.51999214281 TETHER CRYPTOCURRENCY (USDT) held within Nest Services Limited, account number 527231086; incorporated under the law of the Republic of Seychelles with registration number 238045 and address at House of Francis, Room 3

The application is based on these facts:
See attached affidavit.

☒ Continued on the attached sheet.



Applicant's signature

USSS Special Agent Joseph Lea

Printed name and title

Sworn to before me and signed in my presence.

Date:

4/2/25



Judge's signature

City and state: Greenville, SC 29601

US Magistrate Judge William S. Brown

Printed name and title

AFFIDAVIT

I, JOSEPH J. LEA, being duly sworn, declare and state as follows:

I. INTRODUCTION

1. I am a Special Agent ("SA") with United States Secret Service ("USSS") and have been so employed since August 2009. I am currently assigned to the Greenville Residence Office and primarily investigate financial crimes to include wire fraud, identity theft, credit card fraud, bank fraud and money laundering. Prior to becoming an SA with USSS, I was employed as police officer and detective since 2004, where I conducted numerous investigations of fraud schemes. I have received both formal and informal training from USSS and other institutions regarding cyber- and financial-related investigations, digital currencies and computer forensics.

II. PURPOSE OF AFFIDAVIT

2. This affidavit is made in support of an application for a warrant to seize the following (the "Subject Funds"):

a. Any and all Tether digital currency ("USDT") held in a custodial wallet under the control of Binance, identified by account number 527231086 (the "Subject Account"), and under the name of Andrew Aya (AYA). AYA is a resident of Warri South, Delta State, Nigeria. The current estimated value of the account is \$2,050.51 USD.

3. As described more fully below, there is probable cause to believe that the Subject Funds represent the proceeds of one of more violations of 18 U.S.C. §§ 1343 (Wire Fraud), 1956 (Money Laundering), 1957 (Monetary Transactions in Criminally Derived Property), or a conspiracy to commit the same, (the "Subject Offenses"), committed by AYA and other unknown co-conspirators (the

1 "Subjects"), and are therefore subject to seizure pursuant to 18
2 U.S.C. § 981(b) and forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A)
3 & (C).

4 4. In addition, there is probable cause to believe that the
5 Subject Funds are subject to seizure and forfeiture to the United
6 States pursuant to 18 U.S.C. § 982 and 21 U.S.C. § 853(f) because the
7 property would, in the event of conviction on the alleged underlying
8 offenses, be subject to forfeiture, and an order under section 21
9 U.S.C. § 853(e) would not be sufficient to assure the availability of
10 the property for forfeiture.

11 5. The facts set forth in this affidavit are based upon my
12 personal observations, my training and experience, and information
13 obtained from various law enforcement personnel and witnesses. This
14 affidavit is intended to show merely that there is sufficient
15 probable cause for the requested warrants and does not purport to set
16 forth all of my knowledge of, or investigation into, this matter.

17 6. Unless specifically indicated otherwise, all conversations
18 and statements described in this affidavit are related in substance
19 and in part only, and all dates and amounts are approximations.

20 **III. SUMMARY OF PROBABLE CAUSE**

21 7. USSS and local law enforcement agencies are investigating a
22 transnational criminal organization running a romance scheme. In
23 brief summary, investigating agents have determined that a fraud
24 group is using social engineering to contact vulnerable often
25 recently widowed individuals and develop a personal relationship with
26 the victim in a long ongoing effort to extort money from the victim.
27 At the point the victim becomes aware of the scam, the victim has
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1 made numerous deposits via wire transmissions and crypto
2 transmissions. By the time the victim becomes aware of the scam, most
3 funds have been laundered and forwarded on past the point
4 investigators can successfully locate the funds.

5 8. As set forth below, the Subject Account was used by the
6 scammers to receive and launder proceeds of the above-described
7 scheme. Where the Subject Funds cannot be directly traceable to the
8 victims discussed in this affidavit, they are laundered or derivative
9 property found in the same account as the digital currency stolen
10 from victims of this scheme. Finally, investigating agents believe
11 that the Subject Account was created and used primarily for the
12 purpose of laundering scheme proceeds, including outside of the
13 United States. Therefore, there is probable cause to believe that
14 the Subject Funds are subject to seizure and forfeiture by the United
15 States.

16 **IV. STATEMENT OF PROBABLE CAUSE**

17 9. Based on witness interviews, documents obtained from third
18 parties, reports of interviews conducted by other law enforcement
19 officers, conversations with other law enforcement officers, and
20 publicly filed documents, I know the following:

21 **A. Background on Digital Currency**

22 10. Digital currency (also known as virtual currency or
23 cryptocurrency)¹ is generally defined as an electronic-sourced unit
24 of value that can be used as a substitute for fiat currency (i.e.,
25 currency created and regulated by a government). Digital currencies
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27 ¹ For purposes of this affidavit, the terms "digital currency,"
28 "cryptocurrency," and "virtual currency" are used interchangeably and
address the same concept.

exhibit properties similar to other currencies, but do not have a physical form, existing entirely on the internet. Digital currency is not issued by any government or bank (in contrast with fiat or conventional currencies) and is instead generated and controlled through computer software operating on a decentralized peer-to-peer network, often referred to as the blockchain or public ledger. Digital currency is legal in the United States and accepted for legitimate financial transactions. However, digital currency is often used for conducting illegal transactions or for concealing or disguising the true nature, source, location, ownership or control of illegally obtained proceeds. Bitcoin ("BTC") is one of the most commonly used and well-known digital currencies. Ethereum ("ETH") is another popular and commonly used digital currency.

11. A stablecoin is a digital currency whose market value is attached to or "pegged" to another stable asset. Differing from normal digital currencies, the value of stablecoins are pegged to assets such as fiat currencies like the United States Dollar ("USD") or the Euro, or other types of assets like precious metals or other digital currencies. Stablecoins are thus used to mitigate the volatility in the price of digital currency by mimicking the value of a fiat currency, without actually converting digital currency into fiat. While there are various legitimate uses for stablecoins, they are popular with cyber-criminals who seek to hold digital currency proceeds of crime at a stable or near-fixed value without moving those funds into the legitimate financial system into a fiat currency such as USD. Some examples of stablecoins include:

1 a. Tether (USDT) was developed by Tether Limited Inc. and
2 is designed to maintain its value at \$1.00 USD. USDT can utilize the
3 existing ETH blockchain or the newer TRON ("TRX") blockchain.

4 12. A digital currency exchange (an "exchange") is a business
5 that allows customers to trade digital currencies for other digital
6 or fiat currencies. An exchange can be a brick-and-mortar business,
7 or strictly an online business. Both brick and mortar and online
8 exchanges accept a wide variety of digital currencies, and exchange
9 them for fiat and traditional payment methods, other digital
10 currencies, or transfers between digital currency owners. Most
11 exchanges are located outside the boundaries of the United States in
12 order to avoid regulation and legal requirements, but some popular
13 exchanges operate inside the jurisdiction of the United States.
14 Binance is an example of a popular online exchange that is located
15 outside of the United States but cooperates with and accepts legal
16 process from American law enforcement agencies.

17 13. A wallet is a means of storing digital currency identified
18 by unique electronic addresses that allows an individual to conduct
19 transactions on the public ledger. To access a wallet on the public
20 ledger, an individual must use a public address (or "public key") and
21 a private address (or "private key"). The public address can be
22 analogized to an account number while the private address is similar
23 to a password used to access that account. Even though the public
24 address of those engaging in digital currency transactions are
25 recorded on the public ledger, the true identities of the individuals
26 or entities behind the public address are not recorded. If a real
27 individual or entity is linked to a public address, however, it may
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1 be possible to determine what transactions were conducted by that
2 individual or entity. Therefore, digital transactions are often
3 described as "pseudonymous," meaning they are partially anonymous.
4 Most individuals are identified when they use a digital currency
5 exchanger to make a transaction between digital currency and fiat, or
6 through digital currency exchangers that voluntarily or through legal
7 order, cooperate with law enforcement.

8 **B. Background on Romance Scams relating to cryptocurrency**

9 14. What is common across many investment scams when it comes
10 to cryptocurrency is that they initially contact the victim through
11 various avenues using social media. In these cases, the victim is
12 often lured into a personal relationship over a long period of time
13 in which funds are not discussed. Then when the suspect has the
14 victim thoroughly committed, the request for some sort of financial
15 assistance is initiated. Eventually the requests become extensive and
16 with the sense of urgency to prevent in depth questioning.

17 **C. Victim S.C. Loses Digital Currency in the Scam**

18 15. Based on conversations, emails, and reports filed by S.C.,
19 I learned the following:

20 a. Over the past year and a half, S.C. a resident of
21 Greer, S.C. received communication from an individual with whom she
22 eventually began a romantic relationship. She was in regular
23 communication with this individual to whom she believed to be an
24 individual working for a logging company in the Alaskan and Canadian
25 wilderness. Eventually the suspect began to ask S.C. for funds due
26 to various emergency and unforeseen circumstances, "he" needed money.
27 Over the past year and a half, the victim has sent hundreds of
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1 thousands of dollars via wire transmission and through crypto
2 deposits. Of the wires sent, the accounts that received the funds
3 also appear to belong to elderly females, who are likely similar
4 victims and money mules for the suspects.

5 b. Later in the scheme, S.C. was instructed to send funds
6 via crypto currency. S.C. was provided the cryptocurrency address
7 bclq6vxeukx5m8fy8h7jl2cv6ms64xrzjs7w40z75. S.C. stated that she has
8 sent funds to this address on numerous occasions and most recently on
9 October 11, 2024.

10 16. I reviewed transaction history for digital currency wallet
11 bclq6vxeukx5m8fy8h7jl2cv6ms64xrzjs7w40z75 ("Burn Wallet 1") in a
12 commercial blockchain analysis platform. Below is a summary of my
13 review:

14 a. On October 11, 2024, at 21:23 Hrs 0.112081 BTC was
15 deposited into wallet bclq6vxeukx5m8fy8h7jl2cv6ms64xrzjs7w40z75 via
16 transaction hash:
17 0650c470a7a306e2c43d6062870e474bd5ed9687e67fdb80119cffcd791e0e84.
18 Based on my training, experience, and information from the victim, I
19 believe this deposit was from S.C. and matches the account
20 information provided to the Greenville County Sheriff's Office. Those
21 funds were quickly sent out to wallet
22 1JeK9pwAB924xe3F4gRbi7gn3dth1ETMCV ("Suspect Wallet") on October 11,
23 2024 at 21:40Hrs, via transaction hash:
24 b2aad738d778732cbca17c83f50e00c149c8548d3aa24b8bcb7edf221d91f440.

25 17. I reviewed transaction history for digital currency wallet
26 1JeK9pwAB924xe3F4gRbi7gn3dth1ETMCV (Suspect Wallet) in a commercial
27 blockchain analysis platform. This wallet was only active for two
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years, but during that time it received 188 transactions totaling \$308,556.12.

D. Suspect Wallet 1 / Subject Account

18. As discussed previously, Suspect Wallet 1 received numerous deposits from victims as a result of violations of 18 U.S.C. § 1343 (Wire Fraud). As such, there is probable cause to believe that these transfers constituted the proceeds of the Subject Offenses.

19. On November 14, 2024, I reviewed transaction history in Suspect Wallet provided by the hosting exchange, Binance:

a. Binance identified AYA as the account holder of Suspect Wallet. The wallet became active in October 2022. Since that time, Suspect Wallet received 188 deposits totaling approximately \$308,556.12, and sent 486 transactions totaling approximately \$273,007.84.

b. Immediately after the BTC deposits occur, the funds are converted to USDT stable coin via the means of Binance Orders to sell the funds. In this case, approximately 17 minutes after receiving the victim's funds in BTC, the BTC funds are converted to USDT.

c. As it relates to tracing digital currency stolen from the victim discussed above, after the funds were deposited into the first suspect account Burn Wallet 1, the funds were immediately forwarded on to the Suspect Wallet. After the conversion to USDT, the funds are often forwarded out to other wallets via the TRON network.

20. Based on my training and experience, I believe Suspect Wallet was used by the Subjects to receive proceeds from victims of

1 wire fraud and to conceal or disguise the nature, the location, the
2 source, the ownership, or the control of the proceeds obtained from
3 the scam. Therefore, there is probable cause that Suspect Wallet
4 was used to facilitate the commission of the Subject Offenses,
5 contained proceeds of the Subject Offenses and is therefore subject
6 to seizure and forfeiture.

7 21. The Subject Account bears numerous red flags for a money
8 laundering facilitation account, namely:

9 a. The volume of transactions in the Subject Account is
10 highly suspicious, with more than \$300,000 in USD equivalent of
11 digital currency moved through the wallet associated with the Subject
12 Account in less than 2 years;

13 b. The Subject Account does not appear to hold digital
14 currency for long, instead rapidly receiving and then retransmitting
15 digital currency, and often in the form of stablecoins;

16 c. The Subject Account appears to immediately transfer
17 the funds out through a privacy network called TRON;

18 d. The Subject Account does not appear to be engaged in
19 any investment activity, as digital currency is rapidly moved in and
20 out, and stablecoins are designed not to increase in value greater
21 than the USD;

22 e. While these amounts might be unsurprising in a
23 commercial or business account, the Subject Account was opened as a
24 personal account with no identified associated business;

25 f. Public information searches for AYA do not identify
26 any legitimate businesses associated with AYA which would justify a
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1 personal account receiving and sending these volumes of digital
2 currency; and

3 g. The transaction activity in the Subject Account
4 appears consistent with a "layering" account in a money laundering
5 scheme, where an account is used primarily to receive and convert
6 criminal proceeds before transmitting the proceed on to another
7 recipient, thus disguising the source of the proceeds and frustrating
8 asset recovery and law enforcement.

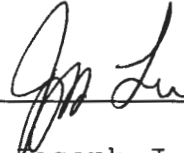
9 22. Based on my own investigation, records provided by Binance,
10 and my training and experience, I believe the Subject Account was
11 used by the Subjects primarily to receive proceeds of romance fraud
12 scams involving digital currency stolen from victims and to conceal
13 or disguise the nature, the location, the source, the ownership, or
14 the control of the proceeds obtained from the scam. The Subject
15 Account further concealed and disguised the nature of the proceeds by
16 combining the numerous deposits and forwarding from the account via
17 the TRON Network. Therefore, there is probable cause the Subject
18 Account was used to facilitate the commission of the Subject
19 Offenses, contains proceeds of the Subject Offenses of USDT (the
20 Subject Funds) are subject to seizure and forfeiture.

21 **V. CONCLUSION**

22 23. Based on the facts set forth above, there is probable cause
23 to believe that the Subject Funds are subject to seizure pursuant to
24 18 U.S.C. § 981(b) and forfeiture pursuant to 18 U.S.C.
25 § 981(a)(1)(A) (rendering subject to forfeiture any property involved
26 in a violation of 18 U.S.C. §§ 1956/1957) and § 981(a)(1)(C)
27 (rendering subject to forfeiture any property that constitutes or is
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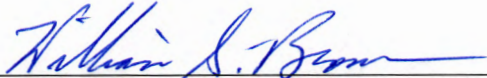
1 derived from proceeds traceable to a violation of 18 U.S.C. §§ 1028,
2 1028A, 1343, 1344).

3 24. This affidavit has been reviewed by Assistant U.S. Attorney
4 Carrie Fisher Sherard.



5
6 Joseph J. Lea
7 U.S.S.S Special Agent
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9 Subscribed to and sworn this 2nd
10 day of April __, 2025.



11
12 THE HONORABLE WILLIAM S. BROWN
13 UNITED STATES MAGISTRATE JUDGE
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